

## TABLE OF CONTENTS

	PAGE
<b>I. INTRODUCTION AND SUMMARY.....</b>	<b>1</b>
<b>II. VERIZON’S PROPOSED SECURITY MEASURES ARE A TERRIBLE SOLUTION IN SEARCH OF A PROBLEM.....</b>	<b>3</b>
<b>A. Introduction.....</b>	<b>3</b>
<b>B. Verizon’s Data Is Unreliable.....</b>	<b>4</b>
<b>C. Verizon’s Proposed Security Measures Are Unnecessary and Unreasonable.....</b>	<b>7</b>
<b>D. Verizon Should Enforce its Existing Collocation Policies.....</b>	<b>11</b>
<b>E. CLECs Are Overpaying for Existing Collocation Security.....</b>	<b>13</b>
<b>F. Verizon Should Pay for its Security Proposals.....</b>	<b>13</b>
<b>G. Verizon Failed to Consider Less Onerous Alternatives.....</b>	<b>14</b>
<b>H. Verizon’s Proposals are Unjust, Unreasonable and Improper.....</b>	<b>15</b>
<b>III. VERIZON’S SECURITY PROPOSALS ARE INCONSISTENT WITH THE TELECOMMUNICATIONS ACT OF 1996.....</b>	<b>16</b>
<b>IV. VERIZON’S SECURITY PROPOSALS ARE UNREASONABLE AND INCONSISTENT WITH THE FCC’S AND THE DEPARTMENT’S COLLOCATION ORDERS AND RULES.....</b>	<b>19</b>
<b>A. Introduction.....</b>	<b>19</b>
<b>B. Separate Space/Entrances for All Forms of Physical Collocation Violates 47 C.F.R. §§51.322(i) and 51.323(k).....</b>	<b>25</b>
<b>C. Relocating Unsecured Cageless Collocation Arrangements to a Secured Location or Converting Them to Virtual Collocation Violates 47 C.F.R. §51.323(k).....</b>	<b>30</b>
<b>D. Partitioning Verizon MA’s Equipment from CLECs or Mandating Escorts at the Collocated Carrier’s Expense Violates §51.23(i).....</b>	<b>32</b>

**TABLE OF CONTENTS (Continued)**

	<b>PAGE</b>
<b>E. Mandating Virtual Collocation and/or Escorts at Physically Collocated remote Terminal (“RT”) Sites Violates §51.323(i). . . . .</b>	<b>33</b>
<b>F. Designating Unspecified High Security Central Offices as Virtual Only Collocation Sites violates 47 C.F.R. §§ 51.323(i), 51.323(k), and 51.323(l). . . . .</b>	<b>34</b>
<b>V. VERIZON’S SECURITY PROPOSALS ARE INCONSISTENT WITH THE VERIZON’MA/SPRINT INERCONNECTION CONTRACT. . . . .</b>	<b>34</b>
<b>VI. VERIZON’S SECURITY PROPOSALS WOULD STIFLE COMPETITION. .</b>	<b>35</b>
<b>VII. CONCLUSION. . . . .</b>	<b>36</b>
<b><i>Verizon Telephone Companies, et. al. v. FCC, et. al.</i>, 292 F.3d 903 (June 18, 2002) . . . . .</b>	<b>TAB 1</b>

